

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RENE MONTANEZ, et al.)
Plaintiffs,)
v.) NO. 08 C 1533
THE CITY OF CHICAGO, et. al.) Judge Gettleman
Defendants.) Magistrate Judge Mason

DEFENDANTS' MOTION FOR PROTECTIVE ORDER TO OBTAIN THE MEDICAL RECORDS OF DEFENDANT DAVID RAMOS

Defendants, Officers Hector Agosto, Virginia O'Donnell, Nicholas Ramirez, David Ramos, Jesse Torres and Jose Ocampo by their attorney, Tiffany Y. Harris, Assistant Corporation Counsel of the City of Chicago, respectfully request this Honorable Court to enter a protective order to obtain the medical records of Defendant, David Ramos and offer in support thereof:

- (1) The above-captioned lawsuit is the result of an incident between the plaintiffs and defendant police officers that occurred on March 16th and 17th of 2007.
- (2) As a result of said incident on March 16th and 17th of 2007 the defendant, David Ramos, was taken to the hospital with injuries.
- (3) In order to adequately defend the case, counsel for the defense needs to obtain the medical records of David Ramos to determine the extent of the injuries he sustained as a result of the incident with the plaintiffs on March 16th and March 17th, 2007.

- (4) There was a previous protective order entered in this case for medical records however it only covered the medical records of the plaintiffs.
- (5) Counsel would like to extend the previous protective order entered in this case to cover the medical records of defendant David Ramos as well as the plaintiffs.
- (6) A copy of the proposed protective order has been attached to this motion.

WHEREFORE, Defendant Officers request that this Court to grant their motion to enter a protective order for the purposes of obtaining the medical records of the defendant, David Ramos, in the above-captioned litigation.

Respectfully submitted,

/s/Tiffany Harris
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